

JS 44 (Rev. 12/07, NJ 5/08)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS JAMES COPPA (b) County of Residence of First Listed Plaintiff _____ (c) Attorney's (Firm Name, Address, Telephone Number and Email Address) Craig Thor Kimmel, Esquire Kimmel & Silverman, P.C. 30 E. Butler Pike Ambler, PA 19002 (215) 540-8888		DEFENDANTS NCO FINANCIAL SYSTEMS, INC. County of Residence of First Listed Defendant _____ NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED. Attorneys (If Known)			
II. BASIS OF JURISDICTION (Place an "X" in One Box Only)		III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)			
<input checked="" type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)		Citizen of This State <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 1 Incorporated or Principal Place of Business in This State <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 4			
<input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)		Citizen of Another State <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 2 Incorporated and Principal Place of Business In Another State <input type="checkbox"/> 5 <input checked="" type="checkbox"/> 5			
		Citizen or Subject of a Foreign Country <input type="checkbox"/> 3 <input checked="" type="checkbox"/> 3 Foreign Nation <input type="checkbox"/> 6 <input checked="" type="checkbox"/> 6			
IV. NATURE OF SUIT (Place an "X" in One Box Only)					
PERSONAL INJURY <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL PROPERTY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PRISONER RELATIONS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	EXERCISE OF JURISDICTION <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other		
			FEDERAL TAXES <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act		IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property		CONTRACTS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 520 Mandamus & Other <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Civil Rights <input type="checkbox"/> 555 Prison Condition		STATE/LOCAL TAXES <input type="checkbox"/> 861 HIA (1951) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	
CONTRACT <input type="checkbox"/> 1 Remanded from Appellate Court		REINSTATEMENT <input type="checkbox"/> 4 Reinstated or Reopened		TRANSFERRED <input type="checkbox"/> 5 Transferred from another district (specify) _____	
V. ORIGIN <input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court		APPEAL <input type="checkbox"/> 3 Remanded from Appellate Court		MULTIDISTRICT <input type="checkbox"/> 6 Multidistrict Litigation <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judgment	
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 15 U.S.C SECTION 1692					
Brief description of cause: Fair Debt Collection Practices Act					
VII. REQUESTED IN COMPLAINT:		<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23		DEMANDS CHECK YES only if demanded in complaint: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
VIII. RELATED CASE(S) (See instructions):		JUDGE		DOCKET NUMBER	
Explanation: 3-116-11					
DATE		SIGNATURE OF ATTORNEY OF RECORD			

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

James Coppa

CIVIL ACTION

v.

NCO Financial Systems, Inc.

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

3-16-11
Date

Craig Kimmel
Attorney-at-law

James Coppa
Attorney for

215-540-8888

877-788-2864

Kimmel@creditlaw.com

Telephone

FAX Number

E-Mail Address

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 500 Ridge Ave., Toronto, OH 43964

Address of Defendant: 507 Prudential Rd., Horsham, PA 19044-2308

Place of Accident, Incident or Transaction: _____
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes No

Does this case involve multidistrict litigation possibilities? Yes No

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?

Yes No

2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?

Yes No

3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?

Yes No

4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?

Yes No

CIVIL: (Place ✓ in ONE CATEGORY ONLY)

A. *Federal Question Cases:*

1. Indemnity Contract, Marine Contract, and All Other Contracts

B. *Diversity Jurisdiction Cases:*

1. Insurance Contract and Other Contracts

2. FELA

2. Airplane Personal Injury

3. Jones Act-Personal Injury

3. Assault, Defamation

4. Antitrust

4. Marine Personal Injury

5. Patent

5. Motor Vehicle Personal Injury

6. Labor-Management Relations

6. Other Personal Injury (Please

specify)

7. Civil Rights

7. Products Liability

8. Habeas Corpus

8. Products Liability — Asbestos

9. Securities Act(s) Cases

9. All other Diversity Cases

10. Social Security Review Cases

(Please specify)

11. All other Federal Question Cases 15 U.S.C. § 1692

(Please specify)

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Craig Kimmel, counsel of record do hereby certify:

Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE: 3-16-11

Attorney-at-Law

57106

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 3-16-11

Attorney-at-Law

57100

Attorney I.D.#

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JAMES COPPA,)
Plaintiff)
v.) Case No.:
NCO FINANCIAL SYSTEMS, INC.,) **COMPLAINT AND DEMAND FOR**
Defendant) **JURY TRIAL**
) **(Unlawful Debt Collection Practices)**

COMPLAINT

JAMES COPPA ("Plaintiff"), by his attorneys, KIMMEL & SILVERMAN, P.C., alleges the following against NCO FINANCIAL SYSTEMS, INC. ("Defendant"):

INTRODUCTION

1. Count I of Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. (FDCPA).

JURISDICTION AND VENUE

2. Jurisdiction of this court arises pursuant to 15 U.S.C. § 1692k(d), which states that such actions may be brought and heard before "any appropriate United States district court without regard to the amount in controversy." and 28

1 U.S.C. § 1331 grants this court original jurisdiction of all civil actions arising
2 under the laws of the United States.
3

4 3. Defendant conducts business and has an office in the Commonwealth
5 of Pennsylvania, and therefore, personal jurisdiction is established.
6

7 4. Venue is proper pursuant to 28 U.S.C. § 1391(b)(1).
8 5. Declaratory relief is available pursuant to 28 U.S.C. §§ 2201 and
9 2202.
10

PARTIES

11 6. Plaintiff is a natural person residing in Toronto, Ohio.
12 7. Plaintiff is a “consumer” as that term is defined by 15 U.S.C. §
13 1692a(3).
14

15 8. Defendant is a national debt collection company with its corporate
16 headquarters located at 507 Prudential Road, Horsham, Pennsylvania, 19044-
17 2308.
18

19 9. Defendant is a debt collector as that term is defined by 15 U.S.C. §
20 1692a(6), and sought to collect a consumer debt from Plaintiff.
21

22 10. Defendant acted through its agents, employees, officers, members,
23 directors, heirs, successors, assigns, principals, trustees, sureties, subrogees,
24 representatives, and insurers.
25

PRELIMINARY STATEMENT

11. The Fair Debt Collection Practices Act (“FDCPA”) is a
comprehensive statute, which prohibits a catalog of activities in connection with
the collection of debts by third parties. See 15 U.S.C. § 1692 *et seq.* The FDCPA
imposes civil liability on any person or entity that violates its provisions, and
establishes general standards of debt collector conduct, defines abuse, and provides
for specific consumer rights. 15 U.S.C. § 1692k. The operative provisions of the
FDCPA declare certain rights to be provided to or claimed by debtors, forbid
deceitful and misleading practices, prohibit harassing and abusive tactics, and
proscribe unfair or unconscionable conduct, both generally and in a specific list of
disapproved practices.

12. In particular, the FDCPA broadly enumerates several practices
considered contrary to its stated purpose, and forbids debt collectors from taking
such action. The substantive heart of the FDCPA lies in three broad prohibitions.
First, a “debt collector may not engage in any conduct the natural consequence of
which is to harass, oppress, or abuse any person in connection with the collection
of a debt.” 15 U.S.C. § 1692d. Second, a “debt collector may not use any false,
deceptive, or misleading representation or means in connection with the collection
of any debt.” 15 U.S.C. § 1692e. And third, a “debt collector may not use unfair
or unconscionable means to collect or attempt to collect any debt.” 15 U.S.C. §

1 1692f. The FDCPA is designed to protect consumers from unscrupulous
2 collectors, whether or not there exists a valid debt, broadly prohibits unfair or
3 unconscionable collection methods, conduct which harasses, oppresses or abuses
4 any debtor, and any false, deceptive or misleading statements in connection with
5 the collection of a debt.

7 13. In enacting the FDCPA, the United States Congress found that
8 “[t]here is abundant evidence of the use of abusive, deceptive, and unfair debt
9 collection practices by many debt collectors,” which “contribute to the number of
10 personal bankruptcies, to marital instability, to the loss of jobs, and to invasions of
11 individual privacy.” 15 U.S.C. § 1692a. Congress additionally found existing
12 laws and procedures for redressing debt collection injuries to be inadequate to
13 protect consumers. 15 U.S.C. § 1692b.

16 14. Congress enacted the FDCPA to regulate the collection of consumer
17 debts by debt collectors. The express purposes of the FDCPA are to “eliminate
18 abusive debt collection practices by debt collectors, to insure that debt collectors
19 who refrain from using abusive debt collection practices are not competitively
20 disadvantaged, and to promote consistent State action to protect consumers against
21 debt collection abuses.” 15 U.S.C. § 1692e.

24 **FACTUAL ALLEGATIONS**

25 15. At all pertinent times hereto, Defendant was hired to collect a

1 consumer debt allegedly owed by Plaintiff.

2 16. The alleged debt at issue arose out of transactions, which were
3 primarily for personal, family, or household purposes.
4

5 17. Beginning in December 2010 and continuing through January 2011,
6 Defendant constantly and repeatedly placed collection calls to Plaintiff seeking
7 and demanding payment for an alleged debt.
8

9 18. Specifically, on December 21, 2010, at 11:18 a.m., Defendant called
10 Plaintiff, leaving a voice mail message. See Exhibit A, Plaintiff's Call Log.

11 19. On the following day, December 22, 2010, Defendant made two
12 telephone calls to Plaintiff, at 10:57 a.m. and 12:04 p.m., leaving a voicemail
13 message at 10:59 a.m. See Exhibit A.
14

15 20. On the next day, December 23, 2010, Defendant again made two
16 telephone calls to Plaintiff, at 2:00 p.m. and 3:32 p.m., leaving a voicemail
17 message at 3:34 p.m. See Exhibit A.
18

19 21. On Christmas Eve, December 24, 2010, Defendant made another
20 telephone call to Plaintiff at 7:58 p.m. See Exhibit A.
21

22 22. Two days later, on December 26, 2010, Defendant made three
23 telephone calls to Plaintiff, 12:31 p.m., 3:55 p.m., and 3:56 p.m., leaving a voice
24 mail message at 12:31 p.m. See Exhibit A.
25

1 23. Then on December 28, 2010, Defendant made a telephone call to
2 Plaintiff and left a voice mail message at 3:16 p.m. See Exhibit A.
3

4 24. On the following day, December 29, 2010, Defendant made another
5 telephone call to Plaintiff, leaving a voice mail message at 12:28 p.m. See Exhibit
6 A.
7

8 25. Then, on December 30, 2010, Defendant made a telephone call,
9 leaving a voice mail message at 9:31 a.m. See Exhibit A.
10

11 26. Most recently, on January 3, 2011, at 2:24 p.m., Defendant made a
12 telephone call to Plaintiff.
13

14 27. In response to the numerous and repetitive telephone calls from
15 Defendant, on January 3, 2011, Plaintiff sent a request for validation of the debt
16 and instructed Defendant to cease all communications with him via telephone.
17 See Exhibit B, Plaintiff's January 3, 2011, letter to Defendant.

18 28. To date, Defendant has failed to provide Plaintiff with written
19 validation of the alleged debt.
20

21 29. Defendant conducted its collection activities in ways that were
22 factually misrepresented and in violation of the FDCPA.
23

CONSTRUCTION OF APPLICABLE LAW

24 30. The FDCPA is a strict liability statute. Taylor v. Perrin, Landry,
25 deLaunay & Durand, 103 F.3d 1232 (5th Cir. 1997). "Because the Act imposes
strict liability, a consumer need not show intentional conduct by the debt collector

1 to be entitled to damages.” Russell v. Equifax A.R.S., 74 F. 3d 30 (2d Cir. 1996);
 2 see also Gearing v. Check Brokerage Corp., 233 F.3d 469 (7th Cir. 2000) (holding
 3 unintentional misrepresentation of debt collector’s legal status violated FDCPA);
 4 Clomon v. Jackson, 988 F. 2d 1314 (2d Cir. 1993).

5 31. The FDCPA is a remedial statute, and therefore must be construed
 6 liberally in favor of the debtor. Sprinkle v. SB&C Ltd., 472 F. Supp. 2d 1235
 7 (W.D. Wash. 2006). The remedial nature of the FDCPA requires that courts
 8 interpret it liberally. Clark v. Capital Credit & Collection Services, Inc., 460 F. 3d
 9 1162 (9th Cir. 2006). “Because the FDCPA, like the Truth in Lending Act (TILA)
 10 15 U.S.C §1601 *et seq.*, is a remedial statute, it should be construed liberally in
 11 favor of the consumer.” Johnson v. Riddle, 305 F. 3d 1107 (10th Cir. 2002).

12 32. The FDCPA is to be interpreted in accordance with the “least
 13 sophisticated” consumer standard. See Jeter v. Credit Bureau, Inc., 760 F.2d 1168
 14 (11th Cir. 1985); Graziano v. Harrison, 950 F. 2d 107 (3rd Cir. 1991); Swanson v.
 15 Southern Oregon Credit Service, Inc., 869 F.2d 1222 (9th Cir. 1988). The FDCPA
 16 was not “made for the protection of experts, but for the public - that vast multitude
 17 which includes the ignorant, the unthinking, and the credulous, and the fact that a
 18 false statement may be obviously false to those who are trained and experienced
 19 does not change its character, nor take away its power to deceive others less
 20 experienced.” Id. The least sophisticated consumer standard serves a dual
 21 purpose in that it ensures protection of all consumers, even naive and trusting,
 22 against deceptive collection practices, and protects collectors against liability for
 23 bizarre or idiosyncratic interpretations of collection notices. Clomon, 988 F. 2d at
 24 1318.
 25

COUNT I

**DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES
ACT**

33. Defendant violated the FDCPA based on the following:

- a. Defendant violated §1692 of the FDCPA generally;
 - b. Defendant violated §1692d of the FDCPA by engaging in conduct the natural consequence of which is to harass, oppress, or abuse the Plaintiff in connection with the collection of a debt;
 - c. Defendant violated §1692d(5) of the FDCPA by causing a telephone to ring and engaging Plaintiff in telephone conversations repeatedly and continuously with the intent to annoy, abuse or harass; and
 - d. Defendant violated §1692f of the FDCPA by using unfair and unconscionable means to collect or attempt to collect a debt.

34. As a direct and proximate result of one or more or all of the statutory violations above, Plaintiff has suffered emotional distress.

WHEREFORE, Plaintiff, JAMES COPPA, respectfully requests judgment be entered against Defendant, NCO FINANCIAL SYSTEMS, INC., for the following:

- a. Declaratory judgment that Defendant's conduct violated the Fair Debt Collection Practices Act,

- 1 b. Statutory damages pursuant to the Fair Debt Collection Practices
2 Act, 15 U.S.C. § 1692k,
3
4 c. Actual damages,
5
6 d. Costs and reasonable attorneys' fees pursuant to the Fair Debt
Collection Practices Act, 15 U.S.C. § 1692k
7
8 e. Any other relief that this Honorable Court deems appropriate.

9 **DEMAND FOR JURY TRIAL**

10 PLEASE TAKE NOTICE that Plaintiff, JAMES COPPA, demands a jury
11 trial in this case.

12 DATED: 3-16-11

13 RESPECTFULLY SUBMITTED,

14 KIMMEL & SILVERMAN, P.C.
15 
By: _____
16 Craig Thor Kimmel
17 Attorney ID # 57100
18 Kimmel & Silverman, P.C.
19 30 E. Butler Pike
20 Ambler, PA 19002
21 Phone: (215) 540-8888
22 Fax: (877) 788-2864
23 Email: kimmel@creditlaw.com
24
25

WWW.GBSOO.COM

NCO PHONE CALLS
MADE TO ME, 2010

WED DEC. 22ND 10:57 A.M - 12:04 P.M.
Thur Dec. 23rd 2:00 P.M - 3:32 P.M.
Fri. Dec. 24TH 7:58, P.M.
SUN DEC. 26TH 3:55 P.M
SUN Dec. 26TH 3:56 P.M.

VOICEMAILS

TUES. Dec. 21ST. 11:18. AM.
WED Dec. 22ND 10:59 A.M.
Thurs. Dec. 23 RD. 3:34 PM.
SUN DEC. 26TH 12:31 P.M.
TUES Dec. 28TH 3:16 P.M.
Wed Dec. 29TH 12:28 P.M.
Thur Dec. 30TH. 9:31 A.M.

FROM JIM COPPA -
Growing Together Through Customer Satisfaction



January 3, 2011

**SENT VIA US CERTIFIED MAIL
SENT VIA FACSIMILE (215-441-3171)
NCO FINANCIAL SYSTEMS
507 Prudential Road
Horsham, PA 19044**

**RE: DEBT VALIDATION AND DEMAND
FOR CESSION OF COMMUNICATIONS
JAMES COPPA
ACCOUNT No: JK4451**

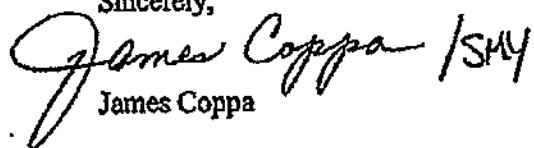
To Whom It May Concern:

PLEASE TAKE NOTICE that this letter will serve as formal DISPUTE of the debt and written request for VALIDATION of the alleged debt pertaining to the above-mentioned account number, pursuant to 15 U.S.C. § 1692 et seq.

Please provide me written validation of the debt, including but not limited to: 1) the name of the original creditor; 2) the address of the original creditor; and 3) a copy of the written agreement authorizing you to act.

FURTHER, I hereby demand that NCO FINANCIAL SERVICES including all of its agents and employees, CEASE any and all COMMUNICATIONS with me via telephone and only contact me via postal mail.

Sincerely,


James Coppa /SMV
James Coppa

